



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405



Ref: 8HWM-FF

JUL 17 1991

Mr. David P. Simonson  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

RE: Review of OU 6 Draft  
Phase I RFI/RI Workplan

Dear Mr. Simonson:

This letter transmits EPA and CDH comments on the Draft Phase I RFI/RI Workplan for Walnut Creek (OU 6) as submitted in April 1991. The Workplan is considerably better than those received previously. However, the draft will require some substantial revisions before it can be approved. Revisions must be coordinated and updated consistent with the latest, ongoing revisions of the SOPs, and the Final EE plan for OU 5.

The plan presented alludes to use of an iterative approach to RFI/RI completion, wherein early information is used to target later investigatory activities. There is nothing wrong with this approach, but this draft plan does not say how, when, or by whom decisions will be made on alternative investigatory activities, or even what these activities may be. The final Workplan for OU 6 must lay out what is thought to be the entire investigation needed to support a ROD, based on a thorough review and evaluation of all existing pertinent information. It is not in DOE's best interest to defer necessary investigations to some later date.

Two glaring technical weaknesses, which could lead to an inability to evaluate important contaminant migration pathways, will require attention. First, there is no discussion of air emissions or data, and no plan for monitoring or evaluating this exposure pathway. Second, the plan contains no means of evaluating potential migration through the vadose zone. Since very limited groundwater monitoring is proposed for many of the sites, the RFI/RI should include soil moisture profiling and (where appropriate) vadose zone monitoring.

It has come to our attention that DOE water management plans call for the use of several of the A and B series ponds as spill containment facilities. The Workplan makes no mention of this, and makes no provision for dealing with potential conflicts and interference between spill control requirements and the progress of the environmental restoration efforts in these areas.

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Coordination between different DOE/EG&G organizational groups in operation and investigation of the ponds is essential, and necessary actions for assuring these efforts remain compatible must be documented in this plan.

Finally, the baseline risk assessment section describes the risk assessment process in terms so generic as to provide no meaningful plan for this particular site. Specific methods must be evaluated or developed for assessing risk under prevailing conditions at RFP. The substantial existing information regarding this site's important contaminants, exposure pathways, and potential receptors has apparently not been evaluated, or at least is not discussed here, and must be.

You will note that comments provided under separate cover by CDH raise a number of issues in addition to those identified by EPA. DOE must respond to these issues to the satisfaction of EPA. We suggest a review meeting be held early in the revision period at which all parties can discuss and agree on a means of addressing any potentially conflicting concerns. Please coordinate this through Bill Fraser, of my staff, at 294-1081.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

Enclosure

cc: Gary Baughman, CDH  
Barbara Barry, CDH  
Scott Grace, DOE  
Tom Greengard, EG&G  
Bill Fraser, EPA